

EXHIBIT 4

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

IN RE: : CASE NO. 3:23-md-03084-CRB
UBER TECHNOLOGIES, INC, :
PASSENGER SEXUAL ASSAULT :
LITIGATION :

HIGHLY CONFIDENTIAL UNDER PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF BROOKE ANDERSON

SAN FRANCISCO, CALIFORNIA

TUESDAY, MAY 6, 2025

REPORTED BY:

DEBBIE LEONARD, CSR, RDR, CRR

CSR NO. 14350

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1 broad sense, understanding when things go wrong or don't
2 follow the right process or whether a process might be
3 improved, it's important for an organization to -- to
4 understand that, to learn from it, and to take action to
5 improve it, also understanding that no organization has a
6 hundred percent record on these kinds of issues, because
7 the world is not a hundred percent safe.

8 But, yes, I think accountability means -- means
9 taking action to constantly improve safety in a broad
10 context, and I believe my organization values that.

11 Q You used to be the global head -- or the head of
12 global safety communications, right?

13 A Correct.

14 Q And in your role as the head of global safety
15 communications, you've instructed your team to defend the
16 company but also know when to own mistakes, right?

17 A Broadly. Absolutely. And what I mean by that,
18 again, not understanding -- not knowing if you're -- what
19 you're referencing specifically, but that sounds like
20 something I would say in the context of, you know,
21 defending the company and -- for example, from a story
22 that we're getting inquired upon that really is not about
23 Uber, and the facts make that clear and it's an error.
24 And we've dealt with quite a few stories that were --
25 that had inaccurate information that wasn't pertaining to

1 our platform.

2 So that would be an example of what I would tell
3 my team, "Hey, share the facts but, you know, defend the
4 company. Our reputation really shouldn't be related to
5 that because it's not pertaining to Uber." Or "just
6 share the facts so that they have a clear picture of what
7 happened."

8 I would argue that those are examples of things
9 that I would describe as defending the company.

10 And then on the other side of that issue, I
11 think I would -- if there was ever something -- a
12 situation where our process wasn't followed or something
13 didn't look right and it merited more review, I think
14 it's really important -- you know, I would want to make
15 sure that my team was an advocate in making sure that we
16 flagged it for the right teams to take action and improve
17 it, because that's part of my broad understanding for an
18 organization, that we would do our best to constantly
19 improve an important issue like safety, and also
20 understanding the world where we operate is not going to
21 be a hundred percent incident free. That was very
22 apparent to me from -- from day one and even before I
23 came to Uber, when managing any -- any safety issue, that
24 not everything in the world is preventable.

25 Q So my question to you was, in your role as the

1 Q Okay. Then you wrote, "Given that we're doing
2 millions of trips every day, the one-in-a-million
3 scenario happens more frequently."

4 Right?

5 A That's right.

6 Q You said, "We need to build a strong foundation
7 of positive and proactive safety PR to strengthen and
8 turn the corner on this narrative," right?

9 A That's right.

10 Q Then you said, "The challenge will be doing that
11 amidst the daily grind of responding to incidents,"
12 right?

13 A Correct.

14 Q Okay. So let's see that in practice.

15 MR. SMITH: If I could have tab 21. This is
16 going to be Exhibit 691.

17 (Exhibit 691 marked for identification.)

18 BY MR. SMITH:

19 Q This is a document that I've handed you as 691,
20 Exhibit 691. It's UBER_JCCP_MDL_000878937. And if you
21 flip to the first page of this document --

22 A Okay.

23 Q -- the -- the title of it is "2017 Stories
24 Squashed - U.S. Safety Team," right?

25 A That's right.

1 Q Okay. And there are, if you look at the
2 pages -- I think it's actually page numbered -- looks
3 like 12 pages to this document. Right?

4 A That's right.

5 Q Okay. So there are 12 pages of squashed stories
6 here, right?

7 A Yes. And I just want to --

8 Q And if we go to page 4, ending in 878940 --

9 A Okay.

10 Q -- and you look down at number 5, Tampa, it
11 says, "Received call about an individual claiming he is
12 an Uber driver and trying to pick up women. He is an
13 Uber driver and may have been trying to pick up women off
14 the app. We didn't confirm that to the reporter but
15 emphasized our safety points and that Uber rides must be
16 requested through the app.

17 "Result: Story killed."

18 Do you see that?

19 A I do.

20 Q All right. Let's go to the bottom of the
21 page -- the next page, page 5 here. It says, "Miami,"
22 number 12.

23 Do you see that?

24 A I do.

25 Q It says, "Miami - Man claimed that an Uber

C E R T I F I C A T E

I, Debbie Leonard, Certified Shorthand Reporter
No. 14350 for the State of California, do hereby
certify:

That the foregoing deposition was taken before me
at the time and place therein set forth, at which time
the witness was put under oath by me; that the testimony
of the witness and all objections made at the time of the
examination were recorded stenographically by me, were
thereafter transcribed by me by means of computer; and
that the foregoing is a true record of same.

I further certify that I am neither counsel for
nor related to any party to said action, nor in any way
interested in the outcome thereof.

IN WITNESS WHEREOF, I have subscribed my name
this 8th day of May, 2025.



Debbie Leonard, CSR, RDR, CRR
CSR NO. 14350